

REMARKS

Claims 43-82 are pending in this application. Claims 43-82 are rejected. Claims 72-74 and 77-81 have been found allowable. Claims 43-44, 48, 52-58, 60, 68, 72-73, 76, 78-80, and 82 are amended; and claims 47, 50-51, and 77 are canceled hereby.

Applicants acknowledge and thank the Examiner for the allowability of claims 72-74 and 77-81.

Responsive to the rejection of claims 50-58, 68, 72-74, and 76-82 under 35 U.S.C. § 112, second paragraph, Applicant has canceled claim 50 and included the limitations of claim 50 in claim 43, with modifications. Regarding the “second dewatering belt” of claim 50, Applicant has amended that language to an “additional dewatering belt” and amended claims depending therefrom accordingly. Further, claim 44 references two circulating, endless dewatering belts of a former; one of these belts is the inner belt of the amended claim 43 and the other is the outer belt, as claimed in claim 44; thus, claim 44 provides for three dewatering belts – the inner belt, the dewatering belt of claim 43, and the outer belt (but it is understood that the additional dewatering belt is not necessarily part of the forming region or former). Regarding antecedent basis for “the element” of claim 50, both claim 47 and claim 50 have been incorporated into claim 43, claim 47 providing antecedent basis for the element of claim 50. Accordingly, Applicant submits that claim 43, and the claims depending therefrom, are now in condition for allowance.

Responsive to the rejection of claims 43-50, 59, 61-63, 67-71, 75, 76, and 82 under 35 U.S.C. § 102(b) as being unpatentable over U.S. Patent No. 6,004,429 (Schiel), to the rejection of claims 43-53, 55-58, 60-61, 63, 66-67, 69-71, and 75 under 35 U.S.C. § 102(b) as being unpatentable over U.S. Patent No. 4,144,124 (Turunen et al.), and to the rejection of claims 43-50, 54, 60-67, 69-71, and 75 under 35 U.S.C. § 102(b) as being unpatentable over U.S. Patent Application Publication No. 2003/0136018 (Herman et al.), Applicant has amended claims 43 and

44, included a part of or all of claims 44, 47, 50, 51, and 77 into claim 43, and canceled claims 47, 50-51, and 77. Accordingly, Applicant submits that claim 43, and claims 44-46, 48-49, 52-76, and 78-82 depending therefrom, are now in condition for allowance.

Schiel discloses a machine and method for producing a fibrous material web. Fig. 1 shows that the machine includes an overfelt 12, an underfelt 50, an upper shoe press roll 40, a grooved bottom roll 38, a channel 66, a spray tube 56, and suction tube 54.

Turunen et al. discloses a machine for manufacturing paper. The machine includes a web W carried by fabric 11 to nip N1 formed by press roll 22 and press roll 21. Press roll 22 includes suction zones 22 α and 22 β .

Herman et al. discloses a method for manufacturing a fiber web. Fig. 3 shows dewatering bands 14, 42, an air press 56, felt 36, membrane 72, roles 60, 62, 64, 66, suction roll 30, and shoe press unit 22.

In contrast, claim 43, as amended, recites in part “a forming region, the forming region having at least one circulating, endless, dewatering belt including an inner belt; at least one pressing zone combined with a suction system, an element to which suction can be applied forming the at least one pressing zone combined with the suction system; an additional dewatering belt, the additional dewatering belt being guided around the element, the fiber material web being between the inner belt and the additional dewatering belt; and at least one of: (a) a belt, the belt being arranged within a loop of the additional dewatering belt, the belt being tensioned around the element; and (b) a roll that lies opposite to the element to which suction can be applied within a loop of the additional dewatering belt.” (Emphasis added). Applicant submits that such an invention is neither taught, disclosed or suggested by Schiel, Turunen et al., and Herman et al., and includes distinct advantages thereover.

Regarding Schiel, Applicant respectfully traverses the rejection of claim 43 based on Schiel. The Office Action at page 3 indicates that grooved bottom roll 38 of Schiel is a suction bottom roll. Schiel does not disclose roll 38 as a suction roll. Rather, Schiel indicates that the grooves of roll 38 are filled with water which is then conveyed during rotation of roll 38 to channel 66. (See generally column 7, lines 51-53). Further, suction tube 54 and spray tube 56 are provided for cleaning underfelt 50 during operation and are not provided in a suction zone of web 46. (Fig. 1; column 7, lines 36-37). Thus, Applicant submits that Schiel fails to disclose at least one pressing zone combined with a suction system, an element to which suction can be applied forming the at least one pressing zone combined with the suction system. Further, pursuant to the current amendments, Applicant has incorporated both claims 51 and 77 into claim 43. The Office Action does not list Schiel as a basis for rejecting claim 51, and claim 77 has been found allowable. Thus, Applicant further submits that for this reason claim 43 as amended is allowable over Schiel.

Regarding Turunen et al., Applicant submits that the amendment to claim 43 distinguishes claim 43 from Turunen et al. It is assumed (for the sake of argument) that the Office Action holds that fabric 30 and roll 22 of Turunen et al. correspond respectively to the third dewatering fabric and the element to which suction can be applied of the present invention; the third dewatering fabric is dewatering belt 34 in each of the figures of the present application (Figs. 1-7), and the element to which suction can be applied is element 32 in each of the figures of the present application (Figs. 1-7). Turunen et al. provides that fabric 30 “laps around the upper press roll 22”. (Column 6, lines 27-30). In so lapping around press roll 22, the figure of Turunen et al. shows that roll 22 is within the loop of fabric 30. By contrast, although the Specification of the present application provides that *element 44* is “wrapped around” by belt 34 (page 14, lines 5-6; page 16, lines 10-12), each of the figures of the present application shows that element 32 is not

within the loop of dewatering belt 34 of the present invention. Thus, the figures of the present application constrain the interpretation of the third dewatering belt (34) being guided “around” the element (32) to provide that element 32 is not within the loop of dewatering belt 34. Thus, Applicant submits that Turunen et al. fails to disclose a third dewatering belt being guided around the element to which suction can be applied, as claimed in claim 43.

Regarding Herman et al., Applicant respectfully traverses the rejection of claim 43 based on Herman et al. The Office Action at page 6 points to Fig. 3 as the basis for the rejection of claim 43 and indicates that either roll 64 or shoe press 22 adjacent dryer cylinder 20 of Herman et al. could serve as the suction system which has been combined with a press zone. Roll 64 is not disclosed as a suction roll but rather simply as a roll. Further, shoe press 22 is not disclosed as including a suction element; indeed, it would seem unlikely that shoe press 22 would include a suction element considering that the web is being transferred to dryer cylinder 20 near shoe press unit 22 and any such suction would tend to inhibit transfer of the web from band 14 to cylinder 20. Thus, Applicant submits that Herman et al. fails to disclose at least one pressing zone combined with a suction system. Further, pursuant to the current amendments, Applicant has incorporated both claims 51 and 77 into claim 43. The Office Action does not list Herman et al. as a basis for rejecting claim 51, and claim 77 has been found allowable. Thus, Applicant further submits that for this reason claim 43 as amended is allowable over Herman et al.

For the foregoing reasons, Applicants submit that claim 43, and claims 44-46, 48-49, 52-76, and 78-82 depending therefrom, are now in condition for allowance, which is hereby respectfully requested.

The amendment to the Specification changing headbox “22” to headbox “24” is consistent with Figs. 1-4.

For the foregoing reasons, Applicant submits that no combination of the cited references teaches, discloses or suggests the subject matter of the amended claims. The pending claims are therefore in condition for allowance, and Applicant respectfully requests withdrawal of all rejections and allowance of the claims.

In the event Applicant has overlooked the need for an extension of time, an additional extension of time, payment of fee, or additional payment of fee, Applicant hereby conditionally petitions therefor and authorizes that any charges be made to Deposit Account No. 20-0095, TAYLOR & AUST, P.C.

Should any question concerning any of the foregoing arise, the Examiner is invited to telephone the undersigned at (260) 897-3400.

Respectfully submitted,

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